

Oren R. Depp*, IL Bar No. 6345841
odepp@jonesday.com
JONES DAY
110 N. Wacker Dr., Suite 4800
Chicago, IL 60606
Telephone: +1.312.269.4208
Facsimile: +1.312.782.8585
*Admitted *pro hac vice*

Angela M. Taylor (State Bar No. 210425)
angelataylor@JonesDay.com
JONES DAY
3161 Michelson Drive, Suite 800
Irvine, CA 92612.4408
Telephone: (949) 851-3939
Facsimile: (949) 553-7539

*Attorneys for Defendant
Experian Information Solutions, Inc.*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ABIGAIL A. RICE,
Plaintiff,
v.
EXPERIAN INFORMATION
SOLUTIONS, INC., et al.,
Defendants.

Case No. 2:24-cv-07394-SPG-PVC

**NOTICE OF MOTION AND
DEFENDANT EXPERIAN
INFORMATION SOLUTIONS,
INC.'S OPPOSED MOTION TO
STAY DISCOVERY AND CASE
DEADLINES OR FOR A
PROTECTIVE ORDER**

Date: June 18, 2025
Time: 1:30 p.m.
Place: Courtroom 5C

**NOTICE OF MOTION AND MOTION TO STAY DISCOVERY AND CASE
DEADLINES OR FOR A PROTECTIVE ORDER**

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD, PLEASE
TAKE NOTICE THAT**, on June 18, 2025, at 1:30 p.m., at the First Street
Courthouse, 350 West 1st Street, Courtroom 5C, Los Angeles, CA 90012, the
Honorable Sherilyn Peace Garnett presiding, Defendant Experian Information
Solutions, Inc. (“EIS”) will, and hereby does, move the Court for an Order staying
discovery and case deadlines as to EIS or, alternatively, for a protective order while
EIS’s Motion to Compel Arbitration is pending resolution.

The Motion is based upon this Notice of Motion and Motion, the
accompanying Memorandum of Points and Authorities, the attached exhibits of
related orders, all of the papers on file in this action, and upon such other and further
evidence or argument that the Court may consider.

This motion is made following the conference of counsel pursuant to L.R. 7-3
which took place on May 6, 2025, as well as an informal discovery conference with
Magistrate Judge Pedro V. Castillo on May 13, 2025.

Dated: May 15, 2025.